

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 2-62				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-15-022			Contract Period 09/01/2015 To 06/30/2018 Base Option Period Number 2			Title of Work Assignment/SF Site Name UIC Primacy & Program Revision				
Contractor CADMUS GROUP, INC., THE					Specify Section and paragraph of Contract SOW 4.3					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance From 07/01/2017 To 06/30/2018				
Comments: The purpose of this work assignment is to provide support for UIC program revisions. All tasks under this work assignment are authorized for immediate start but work shall not commence until 7/1/17.										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> Note: To report additional accounting and appropriations date use EPA Form 1900-69A. (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period: Cost/Fee: LOE: 09/01/2015 To 06/30/2018										
This Action: 										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated: Cost/Fee LOE:										
Cumulative Approved: Cost/Fee LOE:										
Work Assignment Manager Name Lisa McWhirter <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 202-564-2317 FAX Number:			
Project Officer Name Nancy Parrotta <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 202-564-5260 FAX Number:			
Other Agency Official Name Lisa Mitchell-Flinn <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 513-487-2852 FAX Number:			
Contracting Official Name Noelle Mills <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 513-487-2171 FAX Number:			

PERFORMANCE WORK STATEMENT
Cadmus Contract # EP-C-15-022
Work Assignment# 2-62
July 1, 2017 to June 30, 2018

I. ADMINISTRATIVE

A. Title: UIC Primacy and Program Revision Support

B. Work Assignment COR (WACOR):

Lisa McWhirter
Office of Ground Water and Drinking
Water (OGWDW)
1200 Pennsylvania Avenue, NW (MC:
4606M)
Washington, DC 20460
202-564-2317
202-564-3754 (fax)

**Alternate Work Assignment COR
(WACOR):**

Matt Colombo
Office of Ground Water and Drinking Water
(OGWDW)
1200 Pennsylvania Avenue, NW (MC:
4606M)
Washington, DC 20460
202-564-6091
202-564-3754 (fax)

C. Quality Assurance

Tasks 3.1, 3.2, and 3.3 in this work assignment require the use of primary and /or secondary data. Collection, use and analysis of data will be identical to the procedures described in the SQAPP completed under Task 0 of WA 0-62 consistent with the Agency's quality assurance (QA) requirements, appending the Contract Level Quality Assurance Project Plan (QAPP). The project specific quality assurance requirements must be addressed in the work plan and monthly progress reports as specified under Task 0, below.

D. Background

Part 147 of the Code of Federal Regulations sets forth the applicable Underground Injection Control (UIC) programs for each state, territory, and tribe identified pursuant to the Safe Drinking Water Act (SDWA) as needing a UIC program. These UIC programs are described in Part 147 as either a state-administered program approved by the EPA or a federally-administered program promulgated by the EPA. States can apply for primary enforcement authority for their UIC program(s) under §1422 or §1425 of the SDWA. Approval of a state program is based upon a determination by the Administrator that the programs meet the requirements of §1422 and/or § 1425 of SDWA and the applicable UIC provisions of Parts 124, 144, and 146 of the Code of Federal Regulations (CFR).

While 40 CFR Part 147 identifies the UIC programs and the supporting information, 40 CFR Part 145 lays out the requirements for UIC state program submissions and what the approval, revision and program withdrawal processes are for these programs. Therefore, in order to properly implement and enforce the UIC program, EPA codifies the approvals of state primacy programs and their respective revisions in Part 147. This ensures that the UIC requirements for well classes I, II, III, IV, V, and VI for each state and tribe are federally enforceable.

As of September 7, 2011, states, tribes and territories may also apply for Class VI Primacy. Consistent with the President's CCS Task Force, approving Class VI primacy applications will be a priority. As

states' Class VI primacy applications are approved by the EPA Administrator, the states' Class VI UIC programs will be codified in 40 CFR Part 147.

In addition to UIC primacy and revision applications, states will be requesting EPA approval for aquifer exemptions, which are non-substantial program revisions. These program revisions are approved by letter instead of being approved by rule and codified in Part 147. The State of California is reviewing its Class II program and will be submitting aquifer exemption requests to EPA for review and approval.

This work assignment supports the steps necessary for the contractor to provide support in evaluating a state's (states') Class VI primacy application(s) and/or a state's (states') UIC program revision(s) to be codified in Part 147 as well as non-substantial program revisions that will be approved by letter. These steps include: providing support in evaluating Class VI primacy application(s) and/or UIC §1422 and/or §1425 program revision(s) and aquifer exemption requests from the State of California.

II. OBJECTIVE: The contractor shall support EPA in: 1) Comparing states' §1422 programs (including Class VI); 2) Comparing states' §1425 programs; and 3) Reviewing non-substantial program revisions such as aquifer exemption requests from the State of California.

III. TASK DETAIL

The contractor shall perform the following tasks:

Task 0: Work Plan and Monthly Progress Reports

The contractor shall develop a work plan that describes how each task will be carried out. The work plan shall include a schedule, staffing plan, level of effort (LOE), and cost estimate for each task, the contractor's key assumptions on which staffing plan and budget are based, and qualifications of proposed staff. In addition, the workplan shall include the requirement that all electronic and information technology (EIT) and all EIT deliverables be Section 508 compliant in accordance with the policies referenced at <http://www.epa.gov/accessibility/>. If a subcontractor(s) is proposed and subcontractors are outside the local metropolitan area, the contractor shall include information on plans to manage work and contract costs.

In addition, the contractor shall prepare a statement indicating that this WA is a continuation of WA 1-62.

The work plan shall explain that collection, use and analysis of data in this work assignment will be identical to the procedures described in the: Supplemental Quality Assurance Project Plan (SQAPP) completed under Task(s) 0 of WA 0-62. This task also includes monthly progress and financial reports. The monthly progress report shall indicate, in a separate QA section, whether significant QA issues have been identified and how they are being resolved. Monthly financial reports must include a table with the invoice LOE and costs' broken out by the tasks in this WA.

Deliverables: Work plan, Supplemental Project Specific Quality Assurance Project Plan, monthly progress and financial reports.

Task 1: Perform comparison of State UIC §1422 Program Regulations (Including Class VI) (PWS Section 4.3)

Subtask 1.1: Research Federal and State SDWA § 1422 UIC Program Regulations (Including Class VI) for up to four (4) states

Under this work assignment, the EPA WACOR will identify up to four (4) state UIC §1422 programs that the contractor shall analyze. Some of these four (4) states may be for Classes I-V and/or Class VI or Class VI only. The contractor shall provide technical support to EPA Headquarters for the following: (1) review the state UIC §1422 program regulation text in 40 CFR Part 147 for those state(s) identified by the EPA WACOR and note the state statutory and regulatory citations codified in Part 147 for each state identified by the EPA WACOR, (2) initiate a web search to locate the state statutes and regulations for each state identified by the EPA WACOR, (3) gather these statutes and regulations electronically for each state identified by the EPA WACOR and deliver to the EPA WACOR. The WACOR will identify up to four (4) state UIC §1422 programs to be analyzed through technical direction. After receiving technical direction from the EPA WACOR, the contractor shall deliver electronically a copy of the state(s) UIC statutes and regulations to the EPA WACOR within ten (10) calendar days. The EPA WACOR will review and confirm the use of the state's UIC statutes and regulations for the crosswalk analysis in subtask 1.2 below.

Subtask 1.2: Develop and Perform Comparison of State UIC §1422 Crosswalks (Including Class VI)

Under this work assignment, the contractor shall use the §1422 crosswalk and/or the Class VI crosswalk to perform a detailed comparison of the state's UIC statutes and regulations. These crosswalk templates will be provided to the contractor. The contractor shall note any changes, if any, and/or any differences in the state's statutes and regulations from the federal regulations and include these notes in the crosswalk. For planning purposes, the contractor shall perform a detailed comparison of up to four (4) state UIC §1422 programs that will be identified by the EPA WACOR through technical direction. After receiving technical direction, the contractor shall deliver a crosswalk for each of the states identified to the EPA WACOR for review and comment. For planning purposes, the EPA WACOR plans to issue technical direction for each state (up to four (4)) and will stagger these technical directions throughout the performance period (e.g., one technical direction every month or two (2) months). Once the contractor receives technical direction from the EPA WACOR, the contractor shall have sixty (60) calendar days to deliver the draft crosswalk to the EPA WACOR.

Subtask 1.3: Summarize Findings in Subtask 1.2

Under this work assignment, the contractor shall summarize the major changes in states' regulations and statutes as well as any major differences between the states' regulations and the federal regulations in 40 CFR 124, 144, 146, and, if applicable, 148. The draft summary document shall not exceed five (5) pages and be delivered to the EPA WACOR along with the draft crosswalk. For planning purposes, the contractor shall deliver up to four (4) draft summary documents along with the draft crosswalks to be delivered under subtask 1.2 above.

Task 2: Perform comparison of State UIC §1425 Program Regulations

Subtask 2.1: Research Federal and State SDWA §1425 UIC Program Regulations for up to two (2) states

Under this work assignment, the EPA WACOR will identify up to two (2) state UIC §1425 programs that the contractor shall analyze. The contractor shall provide technical support to EPA Headquarters for the following: (1) review the state UIC §1425 program regulation text in 40 CFR Part 147 for those state(s) identified by the EPA WACOR and note the state statutory and regulatory citations codified in Part 147 for each state identified by the EPA WACOR, (2) initiate a web search to locate the state statutes and regulations for each state identified by the EPA WACOR, (3) gather these statutes and regulations electronically for each state identified by the EPA WACOR and deliver to the EPA WACOR. The WACOR will identify up to two (2) state

UIC §1425 programs to be analyzed through technical direction. After receiving technical direction from the EPA WACOR, the contractor shall deliver electronically a copy of the state(s) UIC statutes and regulations to the EPA WACOR within ten (10) calendar days. The EPA WACOR will review and confirm the use of the state's UIC statutes and regulations for the crosswalk analysis in subtask 2.2 below.

Subtask 2.2: Develop and Perform Comparison of State UIC §1425 Crosswalks

Under this work assignment, the contractor shall use the §1425 crosswalk to be provided to the contractor to perform a detailed comparison of the state's UIC statutes and regulations. The contractor shall note any changes, if any, and/or any differences in the state's statutes and regulations from the federal regulations (Guidance 19) and include these notes in the crosswalk. For planning purposes, the contractor shall perform a detailed comparison of up to two (2) state UIC §1425 programs that will be identified by the EPA WACOR through technical direction. After receiving technical direction, the contractor shall deliver a draft crosswalk for each of the states identified to the EPA WACOR for review and comment. For planning purposes, the EPA WACOR plans to issue technical direction for each state (up to two (2)) and will stagger these technical directions throughout the performance period (e.g., one technical direction every month or two (2) months). Once the contractor receives technical direction from the EPA WACOR, the contractor shall have sixty (60) calendar days to deliver the crosswalk to the EPA WACOR.

Subtask 2.3: Summarize Findings in Subtask 2.2

Under this work assignment, the contractor shall summarize the major changes in states' regulations and statutes as well as any major differences between the states' regulations and the federal regulations (Guidance 19). The draft summary document shall not exceed five (5) pages and be delivered to the EPA WACOR along with the draft crosswalk. For planning purposes, the contractor shall deliver up to two (2) draft summary documents along with the draft crosswalks to be delivered under subtask 2.2 above.

Task 3: Provide Non-substantial UIC Program Revision Support for Aquifer Exemption Requests from the State of California

The State of California has SDWA §1425 primacy (or primary enforcement authority) for Class II UIC wells and has issued UIC permits for these wells. As part of the permitting process, the State of California is required to determine whether the owner/operator seeking a Class II permit will be injecting into an underground source of drinking water (USDW) as defined by the Safe Drinking Water Act. If the injection will be or currently is in a USDW, the State of California must submit an aquifer exemption package to EPA Region 9 in order to permit these Class II injection activities. Some aquifers were exempted at the time California received primacy. However, over the years many of these Class II operations have expanded and/or moved into different formations, and injection is occurring outside the boundary of the original exempted aquifers. As a result, the State of California is requesting the owners/operators of these Class II wells to submit an aquifer exemption package to continue operating in these formations. After California reviews the aquifer exemption packages and determines that the injection activities meet the aquifer exemption criteria, California will forward these aquifer exemption packages to EPA Region 9.

For planning purposes, EPA Region 9 expects to receive up to fifteen (15) aquifer exemption packages from the State of California throughout the period of performance. Under this work assignment, the EPA WACOR will send the contractor nonsubstantial UIC program revisions for aquifer exemption packages from the State of California. The EPA WACOR expects to send these requests to the contractor electronically.

Subtask 3.1: Aquifer Exemption Completeness Check and Review and Evaluation of Aquifer Exemption Requests and Supporting Documents

Under this Task, the contractor shall use a modified aquifer exemption checklist that was developed for reviewing proposed aquifer exemption packages submitted to EPA Region 9 by the State of California. This checklist is based on the original checklist found in the EPA Water Division Directors Memo, "Enhancing Coordination and Communication with States on Review and Approval of Aquifer Exemption Requests under SDWA," dated July 24, 2014.

For each aquifer exemption package the EPA WACOR receives from the State of California and forwards to the contractor, the contractor shall use the modified checklist described above and compare the aquifer exemption package to that checklist and determine whether the State of California has submitted a complete aquifer exemption package. In addition, the contractor shall determine whether the information provided by the State of California is adequate to substantiate the aquifer exemption packages. To make this determination, the Contractor shall review and evaluate the data, modeling results, and analyses submitted by the State of California to support its recommendation(s) to EPA to approve the aquifer exemption packages. In the summary memo, the contractor shall also make recommendations for EPA to request from the State of California additional data that may be missing and/or insufficient to support the conclusions in the aquifer exemption package(s).

EPA Region 9 expects to receive up to fifteen (15) aquifer exemption packages from the State of California. The EPA WACOR will forward these aquifer exemption packages electronically to the contractor. For planning purposes, the contractor shall summarize the completeness check and provide a detailed review of the aquifer exemption packages and develop a report or memo not to exceed ten (10) pages per aquifer exemption package and deliver the report to the EPA WACOR within ten (10) business days of receipt of the aquifer exemption package. The contractor shall deliver up to fifteen (15) ten-page summary reports.

Subtask 3.2: Provide Technical Support in Developing Record of Decision Letters for Approving or Denying Aquifer Exemption Requests

Under this Task, the EPA WACOR will request contractor support in drafting the record of decision letter that will provide EPA's rationale for approving or denying an aquifer exemption request. The contractor shall review in depth the entire aquifer exemption package and draft the record of decision letter based on this review. The contractor shall use the template previously agreed upon for drafting the statement of basis letter and may need to revise figures in the aquifer exemption package provided by The California Department of Conservation's Division of Oil, Gas, and Geothermal Resources (DOGGR).

For planning purposes, the contractor shall expect to draft up to fifteen (15) record of decision letters during this period of performance and each record of decision shall be in the range of ten (10) to fifteen (15) pages. The first draft of the record of decision letter shall be due to the EPA WACOR within fifteen (15) business days of receipt of technical direction from the EPA WACOR. EPA will review the draft record of decision letter and submit comments to the contractor. Within ten (10) business days of receipt of EPA's comments, the contractor shall deliver a second draft of the record of decision letter to the EPA WACOR.

Subtask 3.3: Develop GIS maps

Under this Task, the contractor shall develop GIS maps that plot the location of proposed aquifer

exemptions or aquifer exemption applications received by EPA; the lateral and vertical extents of the aquifers proposed for exemption, if known; the location of Class II injection wells that may be shut-in or voluntarily relinquishing their permits; or the location of specific Class II wells by DOGGR Category or by DOGGR District, or other maps as required.

For planning purposes, the contractor shall develop up to three (3) GIS maps per aquifer exemption application that may be received throughout the period of performance, for a total of up to forty-five (45) maps. The EPA WACOR will provide the contractor either a website where data can be downloaded or the actual data to be used in developing these maps. The contractor shall deliver a draft GIS map electronically to the EPA WACOR within ten (10) business days of receiving technical direction from the EPA WACOR and the data to be used in developing the map. EPA will review and submit comments on the maps to the contractor. Within five (5) business days of receipt of EPA's comments, the contractor shall deliver a final GIS map electronically to the EPA WACOR.

Development of GIS maps should leverage desktop software consistent with the Agency Enterprise License Agreement (ELA) agreement with ESRI. The contractor shall produce all maps consistent with EPA standards for GIS desktop software, the current Agency standard for desktop GIS tools is ESRI ArcGIS Desktop 10.4 or higher. In the event that map outputs require online publication, no customized software shall be developed to support this requirement. Online publication of maps should leverage EPA's Geoplatform technical architecture to the fullest extent possible.

Subtask 3.4: Provide Support for Technical Meetings and Communications Support

Under this Task, the contractor shall provide technical support by attending up to four (4) technical meetings in Sacramento and/or Bakersfield, California. These meetings will involve technical discussions on proposed aquifer exemptions as well as status updates and usually last two (2) to three (3) hours. These meetings typically include staff and managers from EPA Region 9, DOGGR, State Water Board, and Regional Water Board. For planning purposes, the contractor shall expect to send one staff that is already located in California to Sacramento and/or Bakersfield for up to four (4) one-day or two-day meetings (includes duration of the meeting plus travel time). Dates and times of these meetings will be determined. The EPA WACOR will provide technical direction at a date to be determined for this Task.

For communication support, the contractor shall provide support in drafting up to two (2) technical presentations (slides, in PowerPoint, and talking points) on the California Class II program and aquifer exemptions. One presentation would be internal to EPA managers and staff and the second presentation would be for the public (e.g., GWPC). For planning purposes, these presentations would be thirty (30) minutes to one (1) hour each. Upon receipt of technical direction from the EPA WACOR, the contractor shall provide a draft presentation (slides and talking points) within fifteen (15) business days. EPA will review the presentation and submit comments to the contractor. Upon receipt of EPA's comments, the contractor shall provide a final draft of the presentation to the EPA WACOR within five (5) business days.

Under this Task, the contractor shall also support EPA in developing briefing papers or quick turnaround summary and/or status update papers. For planning purposes, the contractor shall receive technical direction to prepare up to three (3) briefing or quick turnaround papers. These papers should not exceed five (5) pages. Upon receipt of technical direction from the EPA WACOR, the contractor shall deliver the briefing or quick turnaround paper within five (5) business days.

Subtask 3.5: Provide Technical Support in Reviewing Class II Well Data

Under this Task, the contractor shall provide technical support in reviewing deliverables from the State of California primarily in the form of Excel Spreadsheets or Word documents. These State deliverables will include Class II well data such as location of the wells, formation(s), field(s), operator names, API numbers, status of the wells, type of injection (cyclic steam, disposal, etc.), indication of whether additional information is needed (information orders requested) to evaluate the well, and initial indication of whether the well needs an aquifer exemption or be shut-in. Other deliverables may contain summaries of the data and/or final disposition of wells based on the additional information received from the operators. This task may involve conducting site visits of oil/gas fields where aquifer exemptions are being requested for Class II injection activities.

For planning purposes, the EPA WACOR will provide the state deliverables to the contractor throughout the period of performance. Upon receipt of technical direction, the contractor shall review these Excel Spreadsheets and summary documents and make recommendations to the EPA WACOR to request additional information from the State on specific wells that may be of concern (e.g., these wells are close to a drinking water supply or these wells were initially marked as needing to be shut-in), or make comments and/or observations regarding trends or findings in the data provided. The contractor shall deliver to the EPA WACOR within ten (10) business days a summary of any recommendations for EPA to request additional information from the State of California. The summary document should include well identification information such as API number, operator's name, field and formation (if provided) as well as the additional information recommended for each well. This document should not exceed five (5) pages. The contractor should expect to receive up to four (4) state deliverables, two or three spreadsheets and one or two summary documents.

The contractor shall also track any wells identified as being shut-in, note the documentation ordering these wells to be shut-in (e.g., shut-in orders or state regulations requiring the wells to be shut in by a certain date) or note that this information is missing. These notes can be entered into an Excel spreadsheet per technical direction. The contractor shall deliver upon technical direction the spreadsheet with these notes as well as a summary document not to exceed one page outlining the total number of wells shut-in and how many of those have documentation of being shut in.

IV. SCHEDULE OF DELIVERABLES:

TASK No.	DELIVERABLE	DATE DUE TO EPA
Task 0: Work Plan and Budget		
	Work plan, budget, and QA supplemental	According to Contract
	Telephone calls between WACOR and Project Officer.	Weekly
	Face-to-face meetings at EPA HQ	Monthly
	Kick-off Meeting at EPA	Within 5 calendar days of work assignment approval
	Progress and financial reports	Monthly
Task 1:	Perform Comparison of states' §1422 UIC Programs (Including Class VI)	
	1.1 Electronic copy of states' regulations and statutes	TBD (within 10 calendar days of receiving Technical Direction)
	1.2 §1422 Crosswalk	

	Crosswalk	TBD (within 60 calendar days of receiving Technical Direction)
	1.3 Summary of Findings Summary	TBD (within 60 calendar days of receiving Technical Direction)
Task 2:	Perform Comparison of states' §1425 UIC Programs	
	2.1 Electronic copy of states' regulations and statutes	TBD (within 10 calendar days of receiving Technical Direction)
	2.2 §1425 Crosswalk Crosswalk	TBD (within 60 calendar days of receiving Technical Direction)
	2.3 Summary of Findings Summary	TBD (within 60 calendar days of receiving Technical Direction)
Task 3:	Provide Non-Substantial UIC Program Revision Support for Aquifer Exemption Requests from the State of California	
	3.1 Aquifer Exemption Completeness Check and Review and Evaluation of Aquifer Exemption Requests and Supporting Documents	TBD (within ten business days of receiving Technical Direction)
	3.2 Provide Technical Support in Developing Record of Decision Letters for Approving or Denying Aquifer Exemption Requests First Draft	TBD (within fifteen business days of receiving Technical Direction)
	Second Draft	TBD (within five business days of receiving Technical Direction)
	3.3 Develop GIS Maps First Draft	TBD (within ten business days of receiving Technical Direction)
	Final Draft	TBD (within five days of receiving Technical Direction)
	3.4 Provide Support for Technical Meetings and Communications Support Technical Meetings	TBD
	Technical PowerPoint presentations	TBD (within fifteen business

	First Draft	days of receiving Technical Direction)
	Final Draft	TBD (within five business days of receiving Technical Direction)
	Briefing Papers or Summary Reports	TBD (within five business days of receiving Technical Direction)
	3.5 Provide Technical Support for Reviewing Class II Well Data	
	Summary or recommendations	TBD (within ten business days of receiving Technical Direction)

V. MISCELLANEOUS

Software Application Files and Accessibility

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, § 1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See: <http://www.section508.gov/>

Preferred text format:	MS Word, 8.0 or higher (Office 2003 or higher)
Preferred presentation format:	Power Point, Office 2003 or higher
Preferred graphics format:	Each graphic is an individual GIF file
Preferred portable format:	Adobe Acrobat, version 6.0
Preferred Mapping software format	ESRI ArcGIS Desktop 10.4 or higher

VI. TRAVEL

The contractor shall anticipate three trips in support of this WA (i.e., Tasks 1 through 3) over the duration of the performance period. The travel is anticipated to be to technical and scientific conferences or meetings focused on the topics of Carbon Capture and Storage, Drinking Water Protection, Area of Review delineation, Geologic Sequestration, geology/geophysics, and oil and gas industry practices. Travel will be directly related to the scope of this Work Assignment and support advancement of the work under Tasks 1 through 3 as well as the EPA's Mission to ensure protection of Underground Sources of Drinking Water, human health and the environment.

For estimation purposes, the Contractor shall anticipate three individual trips (one contractor employee) to any of the following cities: Pittsburgh, PA, Chicago, IL, Houston, TX, Sacramento, CA, or equivalent locations. It is anticipated that the duration of each trip will be between two and five days in length.

VII. MEETINGS, CONFERENCES, TRAINING EVENTS, AWARD CEREMONIES AND RECEPTIONS

All appropriate clearances and approvals required by Agency policy in support of any and all conference related activities and expenses, including support of meetings, conferences, training events, award ceremonies and receptions, including the form 5170 for all meetings costing more

than \$20,000, shall be obtained by the EPA CL-COR as needed and provided to the Contracting Officer (CO). Work under conference related activities and expenses shall not occur until this approval is obtained and provided by the EPA CL-COR.

VIII. CONTRACTOR IDENTIFICATION

Contractor personnel shall always identify themselves as contractor employees by name and organization and physically display that information through an identification badge. Contractor personnel are prohibited from acting as the Agency's official representative. The contractor shall refer any questions relating to the interpretation of EPA policy, guidance, or regulation to the CO, CL-COR and/or WACOR.

IX. PRINTING

All copying and printing shall be accomplished within the limitations of the printing clause of the contract.

X. TECHNICAL DIRECTION

The Contract level COR or an authorized individual is permitted to provide technical direction. Technical direction must be within the statement of work of the contract and includes: (1) Direction to the contractor which assists the contractor in accomplishing the Statement of Work, (2) Comments on and approval of reports or other deliverables. Technical direction will be issued in writing or confirmed in writing within five (5) calendar days after verbal issuance. One copy of the technical direction memorandum will be forwarded to the Contracting Officer and the Contract Level Contracting Officer Representative.

XI. QUALITY ASSURANCE SURVEILLANCE PLAN

All task(s) identified in the performance work statement above are subject to review and approval by the EPA WACOR based on the general guidelines of the contract quality assurance surveillance plan regarding: Programmatic, cost control, timeliness/deliverables, and document development standards. Additional project specific quality assurance surveillance plan requirements are identified below.

<u>Performance Requirements</u>	<u>Performance Standards</u>	<u>Surveillance Methods</u>
Performance Standards are applicable to all PWS requirements and will be utilized to determine eligibility for Award Term Options.		
<u>Programmatic Requirement:</u> The contractor shall develop products that are based on best available information and resources.	<u>Programmatic Standard:</u> Outputs are based on best available information and resources; Documentation of sources used, not used, and limitations of available data.	EPA will review all products for conformance with the requirements of the SDWA Amendments, Clean Water Act and other related mandates, including Small Business Regulatory Enforcement Fairness Act 1996 (SBREFA) and Unfunded Mandates Reform Act of 1995 (UMRA).
<u>Cost Control Requirement</u> The Contractor shall perform all work in an efficient and cost effective manner, applying cost control measures where	<u>Cost Control Standard:</u> Implementation of cost control system to monitor and track project status, that indicate level of budget utilized and forecast remaining budget needs to	The EPA Project Officer will routinely discuss the work progress and contract level and work assignment expenditures with the Project Manager. The

practical.	complete project. The contractor shall notify project COR immediately in cases where issues impact project cost are identified.	WACOR will maintain regular contact with the Contractor's designated work assignment /project manager to discuss work assignment progress and expenditures and will review and verify expenditures and technical progress before invoice payments are authorized.
<u>Schedule Requirement</u> The Contractor shall provide services and submit deliverables in accordance with approved work assignment milestone and deliverable schedules.	<u>Schedule Standard:</u> Services and deliverables shall be in accordance with schedules stated in each task order. Unless amended or modified by an approved EPA action, a deliverable that is received 7-days past the due date, will be considered unsatisfactory performance.	EPA will closely monitor task milestone and deliverable schedules and review the Contract Monthly Progress Reports and any special reporting requirements to compare actual delivery dates to those approved in the work assignment.
<u>Document Development Requirement:</u> The Contractor shall provide documents that are technically and factually accurate, and suited to the intended audience.	<u>Document Development Standard:</u> Information to be disseminated by EPA will meet the requirements of OMB's "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity for Information Disseminated by Federal Agencies (67 FR 8451)	The WACOR will review drafts to assess technical accuracy and editorial quality. The WACOR will identify all inaccuracies and needed edits and corrections to the Contractor in the initial review of draft documents

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						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-15-022			Contract Period 09/01/2015 To 06/30/2018 Base Option Period Number 2			Title of Work Assignment/SF Site Name Aquifer Exemption Data Initiat				
Contractor CADMUS GROUP, INC., THE					Specify Section and paragraph of Contract SOW 2.2, 2.3, 4.3, 5.1, 5.22					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance From 07/01/2017 To 06/30/2018				
Comments: The purpose of this work assignment is to provide technical support for the Aquifer Exemption Data Initiative to update the current aquifer exemptions dataset. All tasks under this work assignment are authorized for immediate start but work shall not commence until 7/1/17.										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> Note: To report additional accounting and appropriations date use EPA Form 1900-69A. (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:		LOE:						
09/01/2015 To 06/30/2018				0						
This Action:				458						
Total:				458						
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee		LOE:				
Cumulative Approved:				Cost/Fee		LOE:				
Work Assignment Manager Name Jill Dean						Branch/Mail Code:				
_____ (Signature) (Date)						Phone Number: 202-564-8241				
						FAX Number:				
Project Officer Name Nancy Parrotta						Branch/Mail Code:				
_____ (Signature) (Date)						Phone Number: 202-564-5260				
						FAX Number:				
Other Agency Official Name Lisa Mitchell-Flinn						Branch/Mail Code:				
_____ (Signature) (Date)						Phone Number: 513-487-2852				
						FAX Number:				
Contracting Official Name Noelle Mills						Branch/Mail Code:				
_____ (Signature) (Date)						Phone Number: 513-487-2171				
						FAX Number:				

PERFORMANCE WORK STATEMENT
Cadmus EP-C-15-022
Work Assignment No. 2-70
July 1, 2017 – June 30, 2018

I. ADMINISTRATIVE:

A. Title: Aquifer Exemption Data Initiative

**B. Work Assignment Contracting
Officer's Representative (WACOR):**

Jill Dean
US EPA Headquarters
OGWDW (4606M)
1200 Pennsylvania Avenue NW
Washington, DC 20460
Office: 202-564-8241
Fax: 202-564-3756
E-mail: dean.jill@epa.gov

Alternate WACOR:

Lisa McWhirter
US EPA Headquarters
OGWDW (4606M)
1200 Pennsylvania Avenue NW
Washington, DC 20460
Office: 202-564-2317
Fax: 202-564-3756
E-mail: mcwhirter.lisa@epa.gov

PWS Sections: 2.2, 2.3, 4.3, 5.1, 5.22

LOE: 458

C. Quality Assurance:

Tasks 2 and 3 in this Work Assignment (WA) require the use of primary and/or secondary data. Consistent with the Agency's Quality Assurance (QA) requirements, the contractor must prepare a complete Project Specific Quality Assurance Project Plan (PQAPP), to assure the quality of the data used under this WA. Work on these tasks cannot proceed until the contractor receives notification of PQAPP approval from the Contract Level Contracting Officers Representative (CL-COR) via email. The QA requirements must be addressed in the monthly progress reports as specified under Task 0 below.

Additional information on the PQAPP is described in the Task 1.

D. Background:

The Underground Injection Control (UIC) program has collected national aquifer exemption data in Environmental Protection Agency (EPA) Headquarters. The UIC program requirements are found in the Code of Federal Regulations (CFR) at 40 CFR Parts 144, 146 and 148. The requirements of concern in this work assignment are requests for aquifer exemptions and the supporting underlying data. An aquifer exemption is an aquifer or a portion thereof which meets the criteria for an "underground source of drinking water" (USDW) as laid out in 40 CFR 146.3 and may be determined under 40 CFR 144.7 to be an exempted aquifer if it meets the criteria of 40 CFR 146.4 (a), (b), (c) and (d). Briefly, in order for aquifers (USDWs) to be removed from UIC program protection, they must not serve as a drinking water source now or

in the future based on criteria listed in 40 CFR 146.4 (a), (b) 1-4, and (c); the total dissolved solids must be greater than 3,000 and less than 10,000 mg/L; and the aquifer is not reasonably expected to supply a public water system. Most aquifer exemption requests are usually associated with an injection well permit and are considered a UIC program revision. Aquifer exemption requests are generally managed at the EPA regional and state level, however, there are instances where EPA Headquarters gets involved in the process, namely because some aquifer exemption requests are considered major program revisions. Owners/operators (o/o) of injection wells wishing to exempt underground sources of drinking water (USDW) for purposes associated with underground injection projects may submit an aquifer exemption request or application to the regulatory agency for review. If the regulatory agency is a delegated state UIC program, it can review the application and make a determination that it is technically sound and submit its recommendation for approval to EPA. Only EPA can approve aquifer exemptions. In the case of a Direct Implementation state (States without the UIC program delegation are run by EPA Regions.), the o/o submits the aquifer exemption application directly to the EPA region for review and approval.

II. OBJECTIVE:

EPA maintains aquifer exemptions data at Headquarters. The contractor shall provide technical support to EPA for the Aquifer Exemption Data Initiative to update the current aquifer exemptions dataset with new information. Technical support may include collecting aquifer exemption data from the EPA Regions, communicating with the EPA Regions to ensure accurate interpretation of the data, performing quality control/assurance procedures, and finalizing the aquifer exemption data in an Excel spreadsheet and geospatial information system (GIS) file. Additionally, the contractor shall provide documentation of methodology and decisions as well as metadata for the geospatial data.

The contractor shall provide technical and general support per technical direction only from the WACOR or alternate WACOR for the Aquifer Exemption Data Initiative.

III. TASK DETAIL:

The contractor shall perform the following tasks:

Task 0 – Work Plan, Weekly Conference Calls, and Monthly Progress Reports Submission

The contractor shall develop a work plan that describes how each task will be carried out. The work plan shall include a schedule, staffing plan, level of effort (LOE), and cost estimate for each task, and the contractor's key assumptions on which staffing plan and budget are based, and qualifications of proposed staff. For planning purposes, the work plan shall include the requirement that all electronic and information technology (EIT) and all EIT deliverables that will be publicly released be Section 508 compliant in accordance with the policies referenced at <http://www.epa.gov/accessibility>. If a subcontractor(s) is proposed and subcontractors are outside the local metropolitan area, the contractor shall include information on plans to manage work and contract costs.

Weekly conference calls between the WACOR and contractors are expected to communicate work progress and address any challenges that arise. For planning purposes, no more than

two (2) contractor staff should attend the weekly conference calls. Weekly calls are expected to be no more than one (1) hour in duration.

This task also includes monthly progress and financial reports. The monthly progress report shall indicate, in a separate QA section, whether significant QA issues have been identified and how they are being resolved. Monthly financial reports must include a table with the invoice LOE and costs broken out by the tasks in the WA.

Deliverables: Work plan and monthly progress and financial reports

Task 1 – Project-Specific Quality Assurance Project Plan

Tasks in this WA 2-70 are a continuation of work conducted under WA 0-70 and WA 1-70. The contractor shall update, as needed, the existing PQAPP completed under WA 0-70, as noted in section C Quality Assurance, and ensure the quality of secondary data used to complete these tasks. The PQAPP should reflect the QA procedures that the contractor shall take to assure project quality. The contractor shall write the PQAPP using the active voice. The text of the PQAPP must explicitly reference tools that the contractor shall use to document and review reproducibility and traceability, such as standard operating procedures, check lists, and guidelines. The PQAPP must include the tools as attachments for EPA's review and approval. The contractor shall perform work under this performance work statement in a manner consistent with the PQAPP. In addition, the contractor shall document relevant QA activities in any deliverable.

Quality assurance and metadata support for geospatial files should adhere to EPA approved geospatial procedures and standards found at <https://www.epa.gov/geospatial/geospatial-policies-and-standards>.

Deliverable: PQAPP

Task 2 – Data Update and Quality Assurance

The contractor shall add aquifer exemption data collected from the EPA Regions to a spreadsheet, communicate with Regional staff to ensure accurate interpretation of the data, perform quality control/assurance procedures, update the appropriate quality assurance (QA) fields in the spreadsheet, and finalize the aquifer exemption spreadsheet. The aquifer exemption spreadsheet includes approximately four thousand (4,000) rows of data with around twenty (20) data fields. The WACOR will provide the contractor with a current version of the data. For planning purposes, the contractor shall assume new data for up to one hundred (100) newly approved aquifer exemptions and an update to data for up to five hundred (500) existing records for the WA period. The information provided by the WACOR may be in Excel spreadsheets, Access databases, or portable data file (PDF) format.

Any data that do not meet acceptance criteria prescribed by the PQAPP shall be identified to the WACOR in a memorandum with an explanation of the quality issue. For planning purposes, up to ten (10) memorandums describing data quality issues and either proposed or actual resolution of the issues may be needed. Resolution may include changes to database structure that improve communications, exclusion of data that does not meet quality criteria

described in the PQAPP, or corrections to data elements. It may be necessary for the contractor, upon request from the WACOR, to contact specific EPA Regional staff to clarify or update some data in order to meet quality acceptance criteria.

The contractor shall provide the WACOR with draft versions of the spreadsheet, as needed, in order to facilitate decisions about data management and clarifications requested of Regional staff. After QA processes conclude, the contractor shall provide the WACOR with a final version of the spreadsheet that includes the updated aquifer exemptions data. The deliverable date for final data will be dependent on the work needed to correct any issues. For planning purposes, final data will be due between two (2) weeks and one (1) month after WACOR comments are provided on draft data.

Deliverables: QA issue memorandums, draft and final versions of datasets

Task 3 – Geospatial File Development

Once the aquifer exemption dataset described in Task 2 is final, the contractor shall pair selected data elements from the spreadsheet with point and polygon locations for the exempted aquifers developed in Environmental Systems Research Institute (ESRI) ArcGIS 10.4 or higher. The contractor shall identify whether individual records meet QA criteria using flag fields. The contractor shall provide the WACOR with a subset of the data that meets QA criteria; rows with insufficient, inaccurate, contradictory, or otherwise invalid location information will be excluded. The subset of data will include identifying information for each exempted aquifer; locational information such as county, state, tribe, latitude and longitude of the centroid for each exempted aquifer; the injection well class associated with the aquifer exemption; the exemption area; depth of the exempted aquifer; lithology; approval date; and injectate characteristics. The subset of data shall be appropriate for separate analysis in ESRI ArcGIS 10.4 or higher.

The contractor shall develop a script able to draw boundaries for descriptions of the exempted aquifers in Public Land Survey System (PLSS) format, and a user guide with directions for creating polygons with the script. EPA is aware that a portion of the aquifer exemption locational data may be described in PLSS format or a highly detailed version of PLSS format, e.g. 100 feet from the southern boundary of a specific township, range, and section. For planning purposes, approximately five hundred (500) aquifer exemptions may have descriptions that require a script to develop the polygon boundary. The script should undergo appropriate quality control/assurance processes to ensure that polygon boundaries accurately portray the location of the aquifer exemption boundary. The script and user guide will be given to EPA Regional GIS Coordinators and state UIC programs to create shapefiles in ESRI ArcGIS 10.4 or higher. For planning purposes, the script user guide should be no more than ten (10) pages in length and 508-compliant.

In the event that map outputs require online publication, no custom geospatial software shall be developed to support this requirement. Online publication of maps should leverage EPA's Geoplatform technical architecture (hardware and software) to the fullest extent possible for public search and discovery.

The contractor shall prepare metadata for the geospatial file using the EPA Metadata Editor (EME). (EME; for more information on the EPA Metadata Editor, please see <https://edg.epa.gov/metadata/catalog/main/home.page>.) For planning purposes, the data file destined for the EPA Geoplatform will include up to fifteen data fields and up to five thousand (5,000) rows of data. All fields will be completed to the contractor's best knowledge with input from the WACOR, including optional fields. The final metadata will be validated using EME's validation tool and provided in XML and HTML formats. All geospatial metadata will be published in EPA's Environmental Data Gateway, which serves Data.gov as an Office of Management and Budget (OMB) requirement. Information on metadata and the Environmental Data Gateway may be found at <https://edg.epa.gov/metadata/catalog/main/home.page>.

Deliverables: file with subset of data for separate GIS analysis; PLSS script and user guide; metadata for geospatial file

Task 4 – Communication Materials

The contractor shall convert up to ten (10) individual communication materials to be 508 compliant upon request by the WACOR. For planning purposes, the materials may include fact sheets (up to two pages each), graphic files in JPG or PDF format such as maps, or text documents (up to ten pages each).

Deliverables: user guide for geospatial dataset; 508-compliant documents

IV. Schedule of Deliverables:

TASK No.	DELIVERABLE	DATE DUE TO EPA
0	Work Plan	Per Contract Requirements
	Monthly progress and financial reports	Monthly
	Conference call to discuss project progress	Weekly
1	PQAPP update	Within fifteen (15) days of issuance of work assignment
2	Data quality issue memorandums	As requested by WACOR
	Draft dataset	As requested by WACOR
	Final dataset	By December 31, 2017
3	Geospatial File	By December 31, 2017
	Metadata for geospatial dataset	By December 31, 2017
	Script to create polygons from PLSS locations	By December 31, 2017
	User guide for script	By December 31, 2017
4	508-compliant documents	As requested by WACOR

V. Miscellaneous

Software Application Files and Accessibility

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, § 1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See: <http://www.section508.gov/>

Preferred text format:	MS Word, 8.0 or higher (Office 2003 or higher)
Preferred presentation format:	Power Point, Office 2003 or higher
Preferred graphics format:	Each graphic is an individual GIF file
Preferred portable format:	Adobe Acrobat, version 6.0
Preferred GIS format:	ESRI ArcGIS, version 10.4 or higher

VI. Travel

The contractor should anticipate only local travel, if necessary, in support of this WA over the duration of the performance period.

VII. Meetings, Conferences, Training Events, Award Ceremonies, and Receptions

All appropriate clearances and approvals required by Agency policy in support of any and all conference related activities and expenses, including support of meetings, conferences, training events, award ceremonies and receptions, including the form 5170 for all meetings costing more than \$20,000, shall be obtained by the EPA CL-COR as needed and provided to the Contracting Officer (CO). Work under conference related activities and expenses shall not occur until this approval is obtained and provided by the EPA CL-COR.

VIII. Contractor Identification

Contractor personnel shall always identify themselves as contractor employees by name and organization and physically display that information through an identification badge. Contractor personnel are prohibited from acting as the Agency's official representative. The contractor shall refer any questions relating to the interpretation of EPA policy, guidance, or regulation to the CO, CL-COR and/or WACOR.

IX. Printing

All copying and printing shall be accomplished within the limitations of the printing clause of the contract.

X. Technical Direction

The Contract level COR or an authorized individual is permitted to provide technical direction. Technical direction must be within the statement of work of the contract and includes: (1) Direction to the contractor which assists the contractor in accomplishing the Statement of Work, (2) Comments on and approval of reports or other deliverables. Technical direction will be issued in writing or confirmed in writing within five (5) calendar days after verbal issuance. One copy of the technical direction memorandum will be forwarded to the Contracting Officer and the Contract Level Contracting Officer Representative.

XI. Quality Assurance Surveillance Plan

All task(s) identified in the performance work statement above are subject to review and approval by the WACOR based on the general guidelines of the contract quality assurance surveillance plan regarding: Programmatic, cost control, schedule, and document development standards.

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 2-90				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-15-022			Contract Period 09/01/2015 To 06/30/2018 Base Option Period Number 2			Title of Work Assignment/SF Site Name Reg 9 Tech Support for UIC Pro				
Contractor CADMUS GROUP, INC., THE						Specify Section and paragraph of Contract SOW 2.1, 2.1.1, 2.1.2, 2.2, 2.2.7, 4.3, 4.3.2, 4.3.6				
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance From 07/01/2017 To 06/30/2018				
Comments: Additional sections: 8.1, 8.1.1, 8.3, 8.3.2, 8.3.6, 8.3.8, 8.3.9, 8.3.12, 8.3.13 All tasks under this WA are authorized for immediate start but work shall not commence until 7/1/17.										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> Note: To report additional accounting and appropriations date use EPA Form 1900-69A. (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period: Cost/Fee: LOE: 09/01/2015 To 06/30/2018										
This Action: 										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated: Cost/Fee LOE:										
Cumulative Approved: Cost/Fee LOE:										
Work Assignment Manager Name Kate Rao <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>							Branch/Mail Code: Phone Number: 415-972-3533 FAX Number:			
Project Officer Name Nancy Parrotta <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>							Branch/Mail Code: Phone Number: 202-564-5260 FAX Number:			
Other Agency Official Name Lisa Mitchell-Flinn <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>							Branch/Mail Code: Phone Number: 513-487-2852 FAX Number:			
Contracting Official Name Noelle Mills <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>							Branch/Mail Code: Phone Number: 513-487-2171 FAX Number:			

PERFORMANCE WORK STATEMENT

Contract: EP-C-15-022

Work Assignment No. 2-90

Period of Performance: 7/1/17-6/30/18

I. ADMINISTRATIVE

A. Title: Region 9 Technical Support for Implementation of the Underground Injection Control (UIC) Program, and Navajo Nation UIC Program

B. Work Assignment Contracting Officer's Representative:

Kate Rao
Drinking Water Protection Section
USEPA Region 9
75 Hawthorne Street
Mail Code: WTR 3-2
San Francisco, CA 94105
Email: rao.kate@epa.gov
Phone: 415.972.3533
Fax: 415.947.3549

Alternate Work Assignment Contracting Officer's Representative:

Leslie Greenberg
Drinking Water Protection Section
USEPA Region 9
75 Hawthorne Street
Mail Code: WTR 3-2
San Francisco, CA 94105
Email: greenberg.leslie@epa.gov
Phone: 415.972.3349
Fax: 415.947.3549

C. Quality Assurance:

Tasks 1 - 5 in this work assignment require the use of primary and/or secondary data. Collection, use and analysis of data will be identical to the procedures described in the Supplemental Project Specific Quality Assurance Project Plan (SQAPP) completed under Task 0 of WA 0-90, consistent with the Agency's quality assurance (QA) requirements, appending the Contract Level Quality Assurance Project Plan (QAPP). The project specific quality assurance requirements must be addressed in the monthly progress reports as specified under Task 0, below.

D. Background:

The Safe Drinking Water Act requires the U.S. EPA to regulate underground injection of fluids through wells to protect the quality of underground sources of drinking water. This is done in part by issuing Underground Injection Control (UIC) Program permits to owners of injection wells. The UIC Program divides injection wells into six classes. The six classes are based on similarity in the fluids injected, activities, construction, injection depth, design, and operating techniques. This categorization ensures that wells with common design and operating techniques are required to meet appropriate performance criteria for protecting underground sources of drinking water (USDWs). Class I wells inject hazardous wastes, industrial non-hazardous liquids, or municipal wastewater beneath the lowermost USDW. Class II wells inject brines and other fluids associated with oil and gas production, and hydrocarbons for storage. They inject into either Class II Exempt Aquifers or into saline aquifers that are beneath the lowermost USDW. Class III wells inject fluids associated with solution mining of minerals into either Class III Exempt Aquifers or into saline aquifers that are beneath the lowermost USDW. Class IV wells inject hazardous or radioactive wastes into or above USDWs and are banned unless authorized under a federal or state ground water remediation project. Class V wells include all injection wells not included in Classes I-IV or VI. In general, Class V wells inject non-hazardous fluids into or above USDWs and are typically shallow, on-site disposal systems. However, there are some deep Class V wells that inject below USDWs. Class VI wells inject carbon dioxide captured from an industrial source into deep subsurface rock formations for long-term storage.

EPA utilizes contractor support to evaluate Class I, II, III, V, and VI Underground Injection Control permit applications, draft documents for proposed permit actions, provide technical assistance for permit implementation activities, conduct special studies and project technical reviews as directed and provide direct consultation to Region 9 or Navajo Nation UIC staff. Some application material may contain

confidential business information (CBI). If CBI is noted, the WACOR will properly provide a notice of contemplated disclosure of CBI to the applicant pursuant to 40 CFR Part 2, Sections 301 and 304, prior to providing the contractor the necessary technical direction for a given task under this WA.

II. OBJECTIVE

The contractor shall conduct the timely evaluation of approximately five (5) Underground Injection Control Permit Applications to determine administrative and technical completeness, support the development of documents for approximately three (3) proposed draft and final permit actions, provide technical assistance up to 10 hours per month for permit implementation activities, conduct 8 - 10 special studies or project technical reviews and provide up to 16 hours/month of consultation (on an as-needed, periodic basis) to Region 9 or Navajo Nation UIC staff. All of these actions pertain to the identification and protection of USDWs.

III. TASK DETAIL

The contractor shall perform the following tasks:

Task 0: Work Plan and Monthly Progress Reports

The contractor shall develop a work plan that describes how each task will be carried out. The work plan shall include a schedule, staffing plan, level of effort (LOE), and cost estimate for each task, the contractor's key assumptions on which staffing plan and budget are based, and qualifications of proposed staff. If a subcontractor(s) is proposed and subcontractors are outside the local metropolitan area, the contractor shall include information on plans to manage work and contract costs.

In addition, the contractor shall prepare a statement indicating that this WA is a continuation of WA 1-90. The workplan shall explain that collection, use and analysis of data in this work assignment will be identical to the procedures described in the SQAPP completed under Task 0 of WA 0-90.

This task also includes monthly progress and financial reports which are to be submitted pursuant to Attachment 2 of the contract. The monthly progress report shall indicate, in a separate QA section, whether significant QA issues have been identified and how they are being resolved. Monthly financial reports must include a table with the invoice LOE and costs broken out by the tasks in this WA. The contractor shall immediately notify the Contract Level COR and WACOR if any changes to the tasks involving the collection and analysis of the data occur and prepare a new supplemental to the SQAPP accordingly. Work on these tasks cannot proceed until the contractor receives notification of the new SQAPP approval from the Contract Level COR via e-mail.

The tasks under this work assignment do not require the acquisition of "off-site" facilities for conferences and meetings as defined in the IPN 12-05 and the events associated with this work assignment are not covered by EPA Order 1900.3 and do not require EPA Form 5170.

The contractor shall immediately alert the WA COR to any anticipated event under the work assignment which may result in incurring an estimated \$20,000 or more cost, funded by EPA, specific to that event, meeting, training, etc. Those costs would include travel of both prime and consultant personnel, planning and facilitation costs, AV and rental of venue costs, etc. The EPA WACOR will then prepare approval internal paperwork for the event and will advise the contractor when appropriate signatures have been obtained. At that point, effort can proceed for the event. If the event is being sponsored by another EPA organization, the organization providing the planning is responsible for the approval.

Task 1: UIC Permit Application Review (PWS Area: 4, 4.3, 8, 8.3)

The contractor shall evaluate (approximately 5) UIC Permit Applications submitted to US EPA Region 9 for Class I, II, III, V, or VI injection wells. The contractor shall evaluate the applications for administrative and/or technical completeness as noted below:

Subtask 1.1: Administrative Completeness

(a) administrative completeness per the requirements of 40 CFR part 144, (b) adherence to the minimum federal regulatory permit requirements standards at 40 CFR 144, 145, 146, and 147, (c) identification of any substantive issues of concern for the proposed construction and operation of the injection wells, and (d) overall accuracy and clarity of the application (i.e. any data gaps).

The contractor shall prepare a summary report (approximately 10 pages) of the proposed injection application/project with a determination of administrative completeness and a preliminary assessment of key issues to be addressed in the technical review phase. If the application is incomplete, the contractor shall include in the report a list of outstanding items necessary to make the application complete. The contractor shall submit the draft summary report to the EPA WACOR for review and comment. Upon receipt of comments from the EPA WACOR, the contractor shall finalize the summary report. If the contractor determines that the permit application is deficient, the contractor shall evaluate subsequent submittals as needed for administrative completeness until the application is deemed administratively complete.

Subtask 1.2: Technical Review Analysis

(a) analysis of any well log data and testing results submitted by permit operators, (b) an evaluation of local and regional geology, including receiving formation and confining zone characteristics, (c) area of review (AoR) determinations and zone of endangering influence calculations, (d) recommendations for any corrective action required at existing wells within the AOR, (e) identifications of technical terms and conditions to be imposed in the draft permit – operational, monitoring, testing, reporting, etc., (f) evaluation of plugging and abandonment plans and acceptability of financial assurance, and (g) review and evaluation of any and all other applicable attachment(s) in the application.

The contractor shall submit the draft permit analysis report (approximately 20 pages) to the EPA WACOR for review and comment. The contractor shall include in the report an itemized list of additional information needed to clarify, modify, or supplement the application materials to address technical deficiencies. Upon receipt of comments from the EPA WACOR, the contractor shall finalize the report. If the contractor or EPA determines deficiencies in the technical review analysis, the contractor may be asked to evaluate subsequent submittals as needed until the permit application is technically sufficient.

Task 2: Permit Process Support (PWS Area: 4, 4.3, 8, 8.3)

The contractor shall provide support to approximately three (3) proposed UIC permit action for Class I, II, III, V, or VI injection wells. The contractor may be requested to develop some or all of the following subtasks:

Subtask 2.1: Statement of Basis/Fact Sheet

The contractor shall prepare a statement of basis/fact sheet document for proposed UIC permit actions. The statement of basis/fact sheet shall adhere to the requirements outlined in 40 CFR 124.7 and 124.8 and shall briefly set forth the principal facts and the significant factual, legal, methodological, and policy questions considered in preparing the draft permit. It is anticipated that the statement of basis or fact sheet shall be approximately 4-8 pages in length, and shall be developed for the purpose of explaining to the public the rationale for EPA's proposal to issue the specific permit as drafted. The contractor shall submit the statement of basis/fact sheet to the EPA WACOR for review and comment. Upon the receipt of comments by the EPA WACOR, the contractor shall finalize the document.

Subtask 2.2: Public Notification Document Development

The contractor shall prepare public notification (PN) documents, regarding the proposed UIC Permit. The public notification document shall be prepared in accordance with guidance provided by the EPA WACOR. It is anticipated that each document shall be approximately 1-3 pages in length. The contractor shall submit a draft of the public notification document to the EPA WACOR for review and comment. Upon the receipt of comments, the contractor shall finalize the document.

Subtask 2.3: Public Meetings Hearings Support, and/or Permit Appeals

The contractor shall develop at the direction of the EPA WACOR support material(s) for EPA to use at up to two public informational meetings, hearings, or permit appeal processes. Contractor may also be asked to participate at a public informational meeting, public hearing(s), and/or permit appeal process(es).

Subtask 2.4: Public Comment Review and Response to Comments Development

The contractor shall review public comments submitted, or a specific portion of them, and prepare a response to comments document, summarizing comments received, responding to comments submitted and specify any recommended changes to the draft permit and the reason for change, as described in 40 CFR 124.17. The format to be used will be provided by the EPA WACOR. The contractor will use, to the extent available as provided by the EPA WACOR, as appropriate, standard EPA Region 9 responses to common issues/comments. If commenters raise significant policy issues, the contractor will identify those with notation in the draft response to comments document. EPA Region 9, will take the lead from that point to resolve those issues with the commenter(s) and then provide guidance to the contractor regarding the approach to be taken in finalizing a response to the particular issues raised. As necessary, and prior to the delivery of the final response to comments document, the contractor will contact the EPA WACOR where guidance is needed regarding the approach to be taken in addressing certain comments in the response to comments document. The contractor shall submit a draft of the response to comments document to the EPA WACOR, for review and comment. Upon the receipt of comments, the contractor shall finalize the document.

Task 3: Permit Implementation Support (PWS Area: 2, 2.2, 8, 8.3)

The contractor shall provide support once a permit is issued, including review of drilling plans, logs, pressure transient tests and other technical submittals as required by the terms and conditions of the permit. We anticipate minimal effort for this task.

Task 4: Special Studies and Project Technical Reviews (PWS Area: 2, 2.1, 2.2, 8, 8.3)

The contractor shall develop 8 - 10 special studies and/or project technical reviews as requested and detailed by the EPA WACOR through written technical direction. These studies or reviews will pertain to protection of USDWs or compliance with the Permit under the Safe Drinking Water Act. For these special studies or project technical reviews, the contractor shall prepare a draft report or technical memorandum (typically 5-10 pages in length) for each study/review performed, summarizing the results of the review and recommendations for EPA or Navajo Nation EPA consideration, and opportunity to review and comment. The contractor will incorporate any comments from EPA and/or Navajo Nation EPA and will provide a final draft of each study or review to the EPA WACOR.

Task 5: Consultation Support (PWS Area: 2, 4, 8)

Upon the receipt of written technical direction by the EPA WACOR, the contractor shall make one (1) staff person available to provide consultation support for: a) evaluations and discussions regarding permit reviews or testing, b) special projects, c) drafting permits, and permit appeal processes. For planning purposes, technical support shall be required for approximately eight (8) to sixteen (16) hours per month. Contractor will provide a summary of activities provided under this task as a part of the monthly progress report. At a minimum the summary will include: 1) hours utilized, 2) date of consultation, 3) key points discussed, and 4) any follow-up actions identified per the consultation.

IV. SCHEDULE OF DELIVERABLES:

TASK No.	DELIVERABLE	DATE DUE TO EPA
0	Work Plan, Monthly Progress and Financial Reports	Per Contract Requirements
1	UIC Permit Application Support	
1.1	Permit Application Administrative Completeness Report	Initial draft within 3 weeks of receipt of technical direction.
1.2	Technical Review Analysis	Initial draft within 8 weeks of receipt of technical direction.
2	Permit Process Report	
2.1	Statement of Basis	Initial draft within 2 weeks of receipt of technical direction.
2.2	Public Notification Document Development	Concurrent with submittal of statement of basis.
2.3	Public Meetings/Hearings Support/Permit Appeal	2 - 4 weeks prior to public hearing or 1 -2 weeks from receipt of technical direction.
2.4	Response to Comments Document Development	Within 4 weeks of delivery of public comments.
3	Permit Implementation Support	Within 1-4 weeks of receipt of technical direction., depending on complexity.
4	Special Studies/Technical Reviews	Within 1-6 weeks of receipt of technical direction., depending on complexity
5	Consultation Support	Summary of consultation should be noted in the monthly progress report as noted in Task 5 above.

V. MISCELLANEOUS

Software Application Files and Accessibility

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, § 1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See: <http://www.section508.gov/>

Preferred text format:	MS Word, 8.0 or higher (Office 2003 or higher)
Preferred presentation format:	Power Point, Office 2003 or higher
Preferred graphics format:	Each graphic is an individual GIF file
Preferred portable format:	Adobe Acrobat, version 6.0

VI. TRAVEL

The contractor shall anticipate one (1) contractor trip and one (1) SME trip in support of this WA over the duration of the performance period. Travel will be directly related to the scope of this Work Assignment and support advancement of the work under Task 2, as well as the EPA's Mission to ensure protection of human health and the environment. The contractor shall receive advanced approval from the CL-COR for all non-local travel and this process shall be separate from the work plan approval process. Travel and associated costs shall be allowable in accordance with the contract level clauses. Requests for contractor travel authorizations shall contain the following at a minimum: (1)

Individual(s) traveling. Identify position and affiliation as a contractor/subcontractor employee or authorized consultant. (2) Description of circumstances necessitating the travel. Identify the task that will benefit from the travel and detail the correlation of the travel to the requirements of the Work Assignment. (3) Identify the estimated cost and include a cost breakdown.

VII. MEETINGS, CONFERENCES, TRAINING EVENTS, AWARD CEREMONIES AND RECEPTIONS

All appropriate clearances and approvals required by Agency policy in support of any and all conference related activities and expenses, including support of meetings, conferences, training events, award ceremonies and receptions, including the form 5170 for all meetings costing more than \$20,000, shall be obtained by the EPA CL-COR as needed and provided to the Contracting Officer (CO). Work under conference related activities and expenses shall not occur until this approval is obtained and provided by the EPA CL-COR.

VIII. CONTRACTOR IDENTIFICATION

Contractor personnel shall always identify themselves as contractor employees by name and organization and physically display that information through an identification badge. Contractor personnel are prohibited from acting as the Agency's official representative. The contractor shall refer any questions relating to the interpretation of EPA policy, guidance, or regulation to the CO, CL-COR and/or WACOR.

IX. PRINTING

All copying and printing shall be accomplished within the limitations of the printing clause of the contract.

X. Technical Direction

The Contract level COR or an authorized individual is permitted to provide technical direction. Technical direction must be within the statement of work of the contract and includes: (1) Direction to the contractor which assists the contractor in accomplishing the Statement of Work, (2) Comments on and approval of reports or other deliverables. Technical direction will be issued in writing or confirmed in writing within five (5) calendar days after verbal issuance. One copy of the technical direction memorandum will be forwarded to the Contracting Officer and the Contract Level Contracting Officer Representative.

XI. QUALITY ASSURANCE SURVEILLANCE PLAN

All task(s) identified in the performance work statement above are subject to review and approval by the EPA WACOR based on the general guidelines of the contract quality assurance surveillance plan regarding: Programmatic, cost control, timeliness/deliverables, and document development standards.

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Project Officer Name Nancy Parrotta <div style="border-bottom: 1px solid black; width: 100%;"></div> <div style="display: flex; justify-content: space-between;"> (Signature) (Date) </div>						Branch/Mail Code: Phone Number: 202-564-5260 FAX Number:																																																																			
Other Agency Official Name Lisa Mitchell-Flinn <div style="border-bottom: 1px solid black; width: 100%;"></div> <div style="display: flex; justify-content: space-between;"> (Signature) (Date) </div>						Branch/Mail Code: Phone Number: 513-487-2852 FAX Number:																																																																			
Contracting Official Name Harold D. Hincks <div style="border-bottom: 1px solid black; width: 100%;"></div> <div style="display: flex; justify-content: space-between;"> (Signature) (Date) </div>						Branch/Mail Code: Phone Number: 513-487-2146 FAX Number:																																																																			

PERFORMANCE WORK STATEMENT
Cadmus EP-C-15-022
Work Assignment No. 2-92

I. ADMINISTRATIVE:

A. Title: Support for Guam Environmental Protection Agency: Primacy Technical Support to Prepare Primacy Applications and Specialized Technical Support to Develop Rule Management SOPs

B. Work Assignment Manager (WACOR): Alternate Work Assignment Manager:

Michael Mann	None
U.S. EPA Region 9	
75 Hawthorne Street (LND-3-2)	
San Francisco CA 94105	
(415) 972-3505	
mann.michael@epa.gov	

C. Quality Assurance:

The tasks in this work assignment do not require environmental measurements. Consistent with the Agency's quality assurance (QA) requirements, the Contractor does not need to supplement the Contract Level Quality Assurance Project Plan (QAPP) or prepare a Project-Specific Quality Assurance Project Plan (PQAPP).

D. Background:

Under the Safe Drinking Water Act (SDWA), the Environmental Protection Agency (EPA) is authorized to delegate primary enforcement responsibility of the National Primary Drinking Water Regulations (NPDWRs) to states. In order to maintain primacy, states must adopt all new and revised NPDWRs promulgated under §141 and submit revised primacy applications within two years of rule promulgation (up to four years if EPA approves a two-year extension). §142.12 specifies the requirements for the revision of state programs. Guam Environmental Protection Agency (GEPA), which has been delegated primacy for a drinking water program, has fallen behind in submitting primacy packages for a number of rules, and it does not have the resources to complete this work.

GEPA's drinking water program, by which it regulates public water systems (PWSs) on Guam, has experienced high turnover among its staff in the past several years. In order to promote consistency and continuity during changes to federal rules and its staff, GEPA needs a set of standard operating procedures (SOPs) developed for each cluster of SDWA regulations. These SOPs must be comprehensive, understandable, accurate, updatable, useful documents that would allow a novice to the SDWA program to learn the applicable regulations and how to implement them in a manner consistent with GEPA policies.

This work assignment supports the contract level PWS sections 2.2 and 8.1.2.

II. OBJECTIVE:

The Contractor shall provide support to GEPA in the development of primacy revision applications for all NPDWRs promulgated and currently in effect under §141, as funding allows, except the Total Coliform Rule and the Surface Water Treatment Rule (see Tasks 0 and 1 in Section III below).

The Contractor shall also create GEPA-specific SOPs for the eleven (11) SDWA regulation clusters in effect as of May 17, 2016, as funding allows, in coordination with the current GEPA Safe Drinking Water Program (SDWP) manager and/or designee (the SDWP manager and/or designee hereinafter referred to as “rule manager”) and the EPA WACOR (see Tasks 0, 2, 3, and 4 in Section III below). The eleven specific rule clusters include the following, and are referred to as “Rule(s)” in the remainder of this SOW:

1. Nitrates Rule
2. Radionuclides Rule
3. Total Coliform Rule (includes basic inventory of PWSs)
4. Stage 1 and Stage 2 D/DBP Rule
5. Groundwater Rule – including significant deficiencies
6. Lead and Copper Rule
7. Consumer Confidence Reporting Rule
8. Public Notice Regulations
9. SOC/VOC/IOC Phase II/V Rules (separate sections for arsenic and asbestos)
10. Inventory
11. Surface Water Treatment Rules (SWTR - including determination of GWUDI, LT1SWTR, IESWTR, FBRR and LT2SWTR – including significant deficiencies)

The sequence of SOP development for the rules will be determined by the EPA WACOR, and provided to the Contractor through written technical direction.

The Contractor must utilize knowledge of the SDWA regulations and available implementation and compliance guidance, as well as a working knowledge of the capabilities of SDWIS/STATE Web Release 3.3 for support of rule implementation. Two hard-copies (in binders), as well as an electronic copy, of each SOP shall be provided as deliverables. For the electronic copy, all narratives, instructions, and other documents created by the Contractor must be in Microsoft Office Word 2007 or later format to allow updating. (References and other materials not created by Contractor may be in pdf or other format).

The portions of the SOPs detailing use of SDWIS 3.1 shall be prepared by separate process and are not part of this Performance Work Statement.

III. TASK DETAIL:

The Contractor shall perform the following tasks:

Task 0 – Work Plan and Monthly Progress Reports

The Contractor shall prepare a detailed work plan and budget for the accomplishment of the tasks in accordance with the clause Work Assignments (EPAAR 1552.211-74). The work plan shall include a description of: (a) proposed staff and their qualifications; (b) the number of hours and labor classifications proposed for each task, broken down to task level, to include both prime contractor and subcontractor labor (if applicable); and (c) a list of deliverables, with due dates and schedule for deliverables. The work plan shall also include the Contractor's key assumptions on which the staffing plan and budget are based. If a subcontractor(s) is proposed and subcontractors are outside the local metropolitan area, the Contractor shall include information on plans to manage work and contract costs. In addition, the work plan shall specify that a Supplemental Project Specific Quality Assurance Project Plan (SQAPP) appending the Contract Level Quality Assurance Project Plan (QAPP) or a Project-Specific Quality Assurance Project Plan (PQAPP) is not required.

This task also includes monthly progress and financial reports which are to be submitted pursuant to Attachment 2 of the contract. Monthly financial reports must include a table with the invoice level of effort (LOE) and costs broken out by the tasks in this work assignment (WA).

The tasks under this work assignment do not require the acquisition of "off-site" facilities for conferences and meetings as defined in the IPN 12-05 and the events associated with this work assignment are not covered by EPA Order 1900.3 and do not require EPA Form 5170.

Deliverables: Work plan and monthly progress and financial reports.

Task 1 – Support for GEPA in the Development of Primacy Revision Applications for NPDWRs

At the written direction of the WACOR, the Contractor shall provide support to GEPA in developing primacy revision applications for drinking water rules. For some rules, GEPA may have a draft rule revision and partially compiled draft primacy package. In those cases, the Contractor shall review these drafts, discuss with GEPA, and determine how best to proceed in completing proposed rules and preparing a complete primacy package for submittal to EPA.

For each NPDWR, EPA prepares implementation guidance that provides an explanation of the rule's requirements and guidance for preparing State primacy revision applications. The Contractor should follow the appropriate implementation guidance in its support of GEPA in developing primacy revision applications. Implementation guidance for each of the new and revised rules may be accessed from EPA's website at <http://www.epa.gov/dwreginfo/state-resources-implementing-drinking-water-rules>.

The Contractor will not be allowed to provide technical support to EPA in determining compliance with regulatory requirements for any of the primacy revision applications for which the Contractor provided support to GEPA under this work assignment.

Task 2 - Development and Delivery of Draft SOP(s)

The EPA WACOR will specify the next drinking water rule(s) for SOP development, and provide the Contractor the name/contact information of the rule manager to work with for that drinking water rule. The SOPs will be developed as follows:

Subtask 2.1: Development of first draft SOP(s)

The Contractor shall contact the rule manager for the specific rule for the GEPA-specific material indicated ** in **Attachment 1: Basic Format for Standard Operating Procedures (SOPs)**. Using materials which have been previously prepared for EPA, information supplied by GEPA, as well as those available on the EPA OGWDW website such as the Water Supply Guidance, the Contractor shall assemble a preliminary/draft SOP for the rule. The Contractor shall ensure that at least one (1) senior-level technical expert for the specific rule reviews the draft SOP for accuracy prior to providing the draft to EPA. **The draft SOP may have modifications to the Attachment 1 format as requested by EPA.**

The Contractor shall email a Microsoft Word copy of the draft SOP to the rule manager and the EPA WACOR within thirty (30) business days of the date the Contractor was provided the next list of drinking water rules for which to develop SOPs.

Subtask 2.2: Interview rule manager for additional specific information on rule implementation.

Within fourteen (14) business days after the first draft SOP has been provided to the rule manager and EPA WACOR, the Contractor shall: (1) contact the rule manager and EPA WACOR by telephone and/or email to set up a future phone interview(s) not to exceed total interview time of four hours per rule manager; and (2) develop a brief interview questionnaire based on the model questionnaire (**Attachment 2: Rule Manager Interview Questionnaire**) which will be used to discuss/document any unique GEPA interpretations that the rule manager indicates are not reflected in the draft guidance, document answers to any necessary clarifying questions, document if portions of the rule are not being implemented, and note any areas for rule implementation improvement based upon the Contractor's expertise. **The questionnaire may have modifications to the Attachment 2 format as requested by EPA.**

Subtask 2.3. Document interview/call with rule manager and EPA WACOR

The interview results shall be documented by the Contractor on the questionnaire and provided to the EPA WACOR within five (5) business days of the final interview call.

Task 3 – Finalization of the SOP pending GEPA and Region 9 review

Subtask 3.1: Revision of the first draft SOP after the call/interview to create second draft

Following the interview call, the Contractor shall update/correct the draft SOP to create a second draft. The Contractor shall provide that at least one (1) senior-level technical expert for the specific rule reviews the updated SOP for accuracy prior to providing the final draft to EPA. Within fourteen (14) business days following the final interview call, the Contractor will provide an updated Word version of the second draft SOP via email to the EPA WACOR and rule manager for additional review.

As time and funding allows, the Contractor may also be requested to develop the final draft documents for the remaining SOPs under Subtask 2.2 and 2.3.

Subtask 3.2. Revision of second draft SOP to create final draft

Comments shall be provided back to the Contractor on the second draft SOP. Within seven (7) business days of receipt of EPA comments on the second draft, the Contractor shall update/correct the second draft SOP to create a final draft. The Contractor shall provide that at least one (1) senior-level technical expert for the specific rule reviews the updated SOP for accuracy prior to providing the final draft to EPA. Within seven (7) business days following receipt of comments on the second draft SOP, the Contractor will provide an updated Word version of the final draft SOP via email to the EPA WACOR and rule manager for additional review.

Subtask 3.3: Finalization of SOP

Comments shall be provided back to the Contractor for incorporation, clarification, and final editing. Within seven (7) business days of receipt of final comments from the EPA WACOR, the Contractor shall provide the final rule SOP in electronic version (Word and PDF), along with two hard copies in ring binders. For the electronic copy of each SOP, all narratives, instructions, and other documents created by the Contractor shall be in Word to allow updating. (References and other materials not created by the Contractor may be in PDF or other format).

Task 4 – Creation of Up to Three (3) additional final SOPs

Upon notification by the EPA WACOR of the name/contact information of the rule manager for the next rule SOP(s), the Contractor shall repeat Tasks 2 and 3 for up to three (3) additional rules. Each SOP shall follow the format of Attachment 1: Basic Format for Standard Operating Procedures (SOPs). The materials previously developed for the first SOP (e.g. Attachment 2: Interview Questionnaire, general introduction to SDWA) shall be re-used whenever possible for the additional SOPs; they shall not be re-created. The EPA WACOR shall specify the approximate priorities of the rules for SOP development. The EPA WACOR shall be provided copies of all draft SOPs and be included in all formal interviews.

As time and funding allows, the Contractor is also requested to develop the first draft documents for the remaining SOPs.

IV. SCHEDULE OF DELIVERABLES:

TASK No.	DELIVERABLE	DATE DUE TO EPA
<u>Task 0 – Work Plan and Monthly Progress Reports</u>		
	Delivery of work plan and budget	Within ten (10) business days of receipt of written direction from EPA WACOR.
	Delivery of monthly progress and financial reports.	Within ten (10) business days of the close of the reporting period.
<u>Task 1 – Support for GEPA in the Development of Primacy Revision Applications for NPDWRs</u>		
	Delivery of first draft Primacy Revision Application (emailed to EPA WACOR and rule manager)	Within sixty (60) business days of receipt of written direction from EPA WACOR.
<u>Task 2 – Development and Delivery of draft SOP(s)</u>		
Subtask 2.1	Delivery of first draft SOP (emailed to EPA WACOR and rule manager)	Within thirty (30) business days of receipt of the name/contact information of the rule manager for first rule SOP.
Subtask 2.2	Interview rule manager for additional specific information on rule implementation.	14 business days after providing draft SOP under Subtask 1.1
Subtask 2.3	Document interview/call with rule manager and EPA WACOR	5 business days after the final interview call
<u>Task 3 – Finalization of the SOP pending Region 9 review</u>		
Subtask 3.1	Revision of the first draft SOP after the call/interview to create second draft	14 business days following the final interview call

Subtask 3.2	Revision of second draft SOP to create final draft	7 business days after receipt of comments on 2 nd draft from EPA WACOR
Subtask 3.3	Finalization of SOP	7 business days of receipt of final comments from the EPA WACOR
Task 4 – <u>Creation of Up to Three (3) additional final SOPs</u>		

V. MISCELLANEOUS

Software Application Files and Accessibility

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, § 1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See: <http://www.section508.gov/>

Preferred text format:	MS Word, 8.0 or higher (Office 2007 or higher)
Preferred presentation format:	Power Point, Office 2007 or higher
Preferred graphics format:	Each graphic is an individual JPG file
Preferred portable format:	Adobe Acrobat, version 6.0

VI. Quality Assurance Surveillance Plan

All task(s) identified in the performance work statement above are subject to review and approval by the EPA WACOR based on the general guidelines of the contract quality assurance surveillance plan regarding: Programmatic, cost control, timeliness/deliverables, and document development standards. Additional project specific quality assurance surveillance plan requirements are identified below.

<u>Performance Requirements</u>	<u>Performance Standards</u>	<u>Surveillance Methods</u>
Performance standards are applicable to all PWS requirements and will be utilized to determine eligibility for award term options.		
<u>Programmatic Requirement:</u> The Contractor shall develop products that are based on best available information and	<u>Programmatic Standard:</u> Outputs are based on best available information and resources; Documentation of sources used, not used, and limitations of available data.	EPA will review all products for conformance with the requirements of the SDWA Amendments, Clean Water Act and other related mandates, including Small Business

resources.		Regulatory Enforcement Fairness Act 1996 (SBREFA) and Unfunded Mandates Reform Act of 1995 (UMRA).
<p><u>Cost Control Requirement</u> The Contractor shall perform all work in an efficient and cost effective manner, applying cost control measures where practical.</p>	<p><u>Cost Control Standard:</u> Implementation of cost control system to monitor and track project status, that indicate level of budget utilized and forecast remaining budget needs to complete project. The Contractor shall notify project COR immediately in cases where issues impact project cost are identified.</p>	<p>The EPA Contract Level Contracting Officer's Representative (CLCOR) Officer will routinely discuss the work progress and contract level and work assignment expenditures with the Project Manager. The WACOR will maintain regular contact with the Contractor's designated work assignment /project manager to discuss work assignment progress and expenditures and will review and verify expenditures and technical progress before invoice payments are authorized.</p>
<p><u>Schedule Requirement</u> The Contractor shall provide services and submit deliverables in accordance with approved work assignment milestone and deliverable schedules.</p>	<p><u>Schedule Standard:</u> Services and deliverables shall be in accordance with schedules stated in each work assignment. Unless amended or modified by an approved EPA action, a deliverable that is received 7-days past the due date, will be considered unsatisfactory performance.</p>	<p>EPA will closely monitor task milestone and deliverable schedules and review the Contract Monthly Progress Reports and any special reporting requirements to compare actual delivery dates to those approved in the work assignment.</p>
<p><u>Document Development Requirement:</u> The Contractor shall provide documents that are technically and factually accurate, and suited to the intended audience.</p>	<p><u>Document Development Standard:</u> Information to be disseminated by EPA will meet the requirements of OMB's "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity for Information Disseminated by Federal Agencies (67 FR 8451)</p>	<p>The WACOR will review drafts to assess technical accuracy and editorial quality. The WACOR will identify all inaccuracies and needed edits and corrections to the Contractor in the initial review of draft documents.</p>

ATTACHMENT 1: BASIC FORMAT FOR STANDARD OPERATING PROCEDURES (SOPs)

As a separate volume, a general narrative (plain English) introduction to the SDWA shall be written, including definitions of a PWS, type of PWSs, relationship between the SDWA, the Code of Federal Regulations, and 40 CFR Parts 141 versus 142. Other general information such as tables of the primary and secondary MCLs shall be included. The intent of the introduction to the SDWA is to serve as an accompaniment to all of the SOPs in total.

Each draft SOP must have sections addressing, at a minimum, each of the following areas:

- a. A preface summary sheet (6 pages maximum) that provides a basic guide to GEPA staff on key elements of the rule and aspects of the rule that they are likely to implement on a frequent or routine basis. The intent of the summary sheet is not to be all-inclusive of the rule requirements but, rather, to serve as a quick reference guide for a GEPA staff person on day-to-day implementation of the rule. The guide should be tailored to be as specific as possible to Guam PWSs. Any allowance for exceeding the 6-page maximum must be approved by the EPA WACOR, on a case-by-case basis.
- b. General narrative (plain English) introduction to the SOP-specific rule(s), including identification of all sections in the 40 CFR which are applicable. This introduction must recommend reading materials for the new rule manager, including proposed and final Federal Registers (copies included), implementation guidance (reference where available), question and answer documents, etc. The Contractor shall also modify the electronic Code of Federal Regulations (excerpt those portions related to the rule(s) into a Word document) to provide repeated section/subsection references to allow easier reading. An example will be provided by the EPA WACOR. The general narrative must also briefly explain how the specific rule(s) interact with all other rule(s) – such as how changes to SWTR treatment (from conventional to alternative filtration) may affect enhanced coagulation requirements under the Stage 1 DBPR, and how the treatment change may affect monitoring requirements under the Lead and Copper Rules. A full list of references for that rule(s) must be provided.
- c. Implementation Basics. This may be split into the following sections at a minimum. Separate sections may be needed for very complicated rule clusters such as IESWTR/LT1SWTR versus LT2SWTR. Non-written GEPA policies in each of these areas should be discussed as provided by the rule manager.**
 - 1) – how to determine regulated universe of PWSs for the specific rule.
 - 2) – how to address new systems and/or new sources for this rule
 - 3) – expectations (submittals from) the regulated universe: monitoring data, sampling data, use of certified labs, monthly reports and where these requirements are referenced in the 40 CFR. Copies of GEPA-specific monitoring and reporting forms (and where they can be found at GEPA)**
 - 4) – monitoring/sampling plan requirements, increased/decreased monitoring, various approval letters for these**
 - 5) – use of Reporting Tool or other GEPA-generated reports used for implementation
 - 6) – what constitutes each type of violation
 - 7) – how to use Compliance Decision Support and migrate candidate violations

- 8) – timeframes and processes for reminding systems of potential FTM/FTR violations, determining each type of violation, SDWIS data and violation entry timeframes**
 - 9) – needed action by the rule manager and the PWS for each type of violation or noncompliance situation, including templates of violation letters**
 - 10) – how to determine “Return to Compliance” (include latest OGWDW spreadsheet)
 - 11) PLACEHOLDER FOR: how to use SDWIS 3.1 for implementation
 - 12) - Public Notice Requirements and templates ** specific to the rule(s)
 - 13) - CCR Requirements and templates ** specific to the rule(s)
- d. Compilation of OGWDW and written GEPA-specific policies for implementing this rule(s). Specify where found on internet and at GEPA. (GEPA documents shall be provided to the Contractor)**
 - e. Compilation of GEPA presentations on the rule(s) – handout copies of PowerPoint presentations as well as indication of location at GEPA (folder, file name)**
 - f. Copies of all GEPA tracking spreadsheets, including locations at GEPA**
 - g. Brief discussion of GEPA final document disposition (filing) for all data, reports, etc**

ATTACHMENT 2: RULE MANAGER INTERVIEW QUESTIONNAIRE

GEPA STANDARD OPERATING PROCEDURES _____ RULE

Cadmus Interviewer: _____

Attendees: GEPA: _____

Cadmus: _____

Rules Covered: _____

Date: _____

All questions were answered from the point of view of the topic covered.

Protocols for the PWSs

1. Does GEPA have any specific protocols or written guidance materials for water systems in the following scenarios? If Yes, please explain.

	Y/N	Protocols	Y/N	Guidance
a. Whole New Systems (built or found)		•		
b. Existing Systems Acquiring a New Source		•		
c. Approving Parties to Conduct Testing		•		
d. PWS Data Submittal		•		
e. Notifying PWS of a Violation		•		
h. Sampling Procedure Guidance		•		•

Protocols for the Region

2. Does GEPA have any specific protocols or written guidance materials for Regional staff or contract staff in the following scenarios? If Yes, please explain.

	Y/N	Protocols	Y/N	Guidance
a.		Sanitary Survey or PWS Site Visits	•	
b.		Reporting Special Information to EPA Headquarters	•	
c.		Public Notification	•	
d.		Monitoring Schedules	•	
e.		Initial Monitoring	•	
f.		Routine Monitoring	•	
g.		Increased/Additional Monitoring	•	
h.		Reduced Monitoring/Waivers		
i.		Data Processing	•	
j.		Enforcement	•	
k.		Emergency	•	

Templates for the PWSs

3. Does GEPA have any additional guidance documents and/or templates to help PWSs? If Yes, please explain. For the templates please include how they are formatted and used.

	Y/N	Guidance	Y/N	Templates
a.		Public Notification		
b.		CCR		

Filing System

4. Can you please describe your electronic and hard copy filing system?

Including:

- a. A description of your electronic and hard copy filing system?

- b. How information is submitted and processed?
- c. How is GEPA organizing, reviewing and storing submissions from PWSs?
- d. How are laboratories and PWSs reporting to GEPA?
- e. Is GEPA using a database to track the completeness of PWS and laboratory submissions? Is there guidance on the use? Where is it located?

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment		Work Assignment Number 2-94								
Contract Number EP-C-15-022		Contract Period 09/01/2015 To 06/30/2018 Base Option Period Number 2								
Contractor CADMUS GROUP, INC., THE		Title of Work Assignment/SF Site Name Region 8 Public Comment Support								
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Work Plan Approval		Specify Section and paragraph of Contract SOW 4.3, 6.1.9								
Period of Performance From 07/07/2017 To 06/30/2018		<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:								
Comments: All tasks under this work assignment are authorized for immediate start.										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO (Max 2) <input type="checkbox"/>										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:		LOE:						
09/01/2015 To 06/30/2018				0						
This Action:				460						
Total:				460						
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:		Cost/Fee		LOE:						
Cumulative Approved:		Cost/Fee		LOE:						
Work Assignment Manager Name Bruce Suchomel						Branch/Mail Code:				
_____ (Signature) _____ (Date)						Phone Number: 303-312-6001				
						FAX Number:				
Project Officer Name Nancy Parrotta						Branch/Mail Code:				
_____ (Signature) _____ (Date)						Phone Number: 202-564-5260				
						FAX Number:				
Other Agency Official Name Lisa Mitchell-Flinn						Branch/Mail Code:				
_____ (Signature) _____ (Date)						Phone Number: 513-487-2852				
						FAX Number:				
Contracting Official Name Noelle Mills						Branch/Mail Code:				
_____ (Signature) _____ (Date)						Phone Number: 513-487-2171				
						FAX Number:				

PERFORMANCE WORK STATEMENT

Contract: EP-C-15-022

Work Assignment No. 2-94

Period of Performance: Issuance-6/30/18

I. ADMINISTRATIVE

A. Title: Organizing Dewey-Burdock's Public Comments (for the Region 8 proposed Dewey-Burdock in-situ uranium recovery project)

B. Work Assignment Manager:

Bruce Suchomel
Underground Injection Control (UIC) Unit
USEPA Region 8
1595 Wynkoop Street
Mail Code: 8WP-SUI
Denver, CO 80202-1129
Email: suchomel.bruce@epa.gov
Phone: 303.312.6001
Fax: 303.312.6741

C. Quality Assurance:

The administrative nature of this work assignment does not involve the use of primary and/or secondary data. When the WA does not involve the use of primary and/or secondary data, a QAPP is not required.

D. Background:

The EPA is the action agency proposing three distinct but related actions: a Class III UIC permit to specify the conditions for injection of fluid into uranium ore zones; an aquifer exemption for the Class III injection areas; and a Class V disposal permit to dispose of treated waste fluids from the uranium mining operation. These actions are regulated under the Safe Drinking Water Act and its regulations at 40 CFR parts 124, 144 and 146. Certain conditions apply to all UIC permits and may be incorporated either expressly or by reference. Additionally, UIC regulations specific to injection wells in South Dakota are found at 40 CFR 147 part QQ.

As part of the administrative record for the draft UIC permits and proposed aquifer exemption are a draft cumulative effects analysis document, a draft environmental justice analysis document and a draft document proposing the EPA's plan for complying with Section 106 of the National Historic Preservation Act. These documents are also available for public review and comment.

The UIC permitting process requires a public notice period. Over 8,000 public comments pertaining to the Dewey-Burdock project have been received by EPA Region 8 as of June 9, 2017. In order for Region 8 UIC personnel to properly manage and assess the comments, the comments must first be organized into categories. The contractor support is specifically needed to organize the public comments.

II. OBJECTIVE

In two phases of work effort, the contractor is to provide the Region 8 UIC Unit with two documents:

- (1) A document containing all public comments compiled from e-mailed comments, mailed letters and postcards, and written comments submitted to the EPA during the public hearings.
- (2) A document that includes all the public comments compiled in the first document, plus comments from

the five (5) Dewey-Burdock public hearing transcripts, organized under separate categories based on the content of each comment.

To initiate this work, Region 8 will supply the contractor with the electronic files of the transcripts, emails and mailed letters, written comments received during the public hearings and the comment categories. Comments received from a single individual may need to be broken out and split into more than one category. The deliverables will consist of the two documents listed above. The first document should be in Adobe Acrobat format with searchable text; the second document should be provided in the contractor's latest version of Microsoft Word.

III. TASK DETAIL

The contractor shall perform the following tasks:

Task 1: Compiling all the written public comments received by the EPA on the UIC proposed actions into one document. (PWS Area 4.3, 6.1.9)

The EPA will provide the Contractor with:

- A. Approximately 10,000 template emails by either sharing the Outlook folder or by forwarding the emails to an email account to be provided by the contractor, and
- B. Approximately 2,000 pages of documents in Word or pdf format containing the written public comments received with through email or mail or during the public hearings (not including the transcripts from the public hearings).

Subtask 1.1: Template Email Review

The Contractor shall review approximately 9,000 – 10,000 Outlook emails that are mostly identical (see template below) to identify additional comments or text that may have been added by the individual senders.

For clarity and purposes of understanding the nature of the emails, the emails originated from this website:

http://org.salsalabs.com/o/676/p/dia/action4/common/public/?action_KEY=21716&tag=mining

The email consists of a template that can be edited by the email sender. Most of the template emails received by the EPA to date appear to include no edits to the template.

If the Contractor identifies any edits to the template or additional comments added to the template email by the individual sender, the edited portion or the additional comment shall also be included in the compiled comments.

Template for Mass Email:

Dear EPA,

Thank you for the opportunity to comment on the Underground Injection Control Program's Draft Permits for the Proposed Dewey-Burdock Uranium Mine and Deep Disposal Wells.

The proposed mine and deep disposal wells are in an area that is documented to have faults, fractures, breccia pipes, and over 7000 old boreholes that have not been properly plugged. It will be impossible to contain mining fluids or waste liquids, and contamination of groundwater resources is very likely.

I am also concerned that adequate oversight of the quality of liquid wastes pumped into the Minnehusa Formation through the proposed deep disposal wells will be inadequate, and groundwater is likely to be contaminated.

A full survey of cultural and historical sites is needed before mining or deep disposal is allowed. Cultural and historical sites must be protected.

The history of uranium mining indicates that uranium mining cannot be done without creating and leaving contamination. Groundwater has never been returned to its original condition at any In-Situ leach uranium mine in the U.S. These permits should not be issued until it can be demonstrated that groundwater resources will be protected.

JOANNE Conti
PO Box 59
SHEFFIELD, MA 01257

Subtask 1.2: Generation of Document Containing Written Comments Received by the EPA.

The contractor shall compile all the comments from sources A and B above into one document.

The format of this document shall be Adobe Acrobat with searchable text. The EPA will post this document on the Region 8 UIC Program website where it will be available for public access and review.

For estimation purposes, there will be approximately 2,000 pages of written comments from letters, emails and other written comments. The EPA will provide the written comments to the contractor as electronic files in Microsoft Word or pdf format with the name of the commenter included to identify the source of the comments.

NOTE: Following receipt of the email folder and written comments from the WA-COR, the Contractor shall generate the first document within 20 business days.

Task 2: Categorization of all the public comments received by the EPA on the UIC proposed actions in one document. (PWS Area 4.3, 6.1.9)

The contractor shall generate the second document using the document generated under Task 1 and the comments from the five (5) public hearing transcripts.

The EPA shall provide the Contractor with:

- A. The five (5) public hearing transcripts in Adobe Acrobat pdf format, and
- B. A list of categories under which comments shall be sorted and categorized.

For estimation purposes, the five (5) public hearing transcripts contain a total of 840 pages of testimonies by different individuals. The transcripts are in pdf format from which sentences or phrases can be highlighted, copied and pasted under the different topic categories.

Comments from a single source may need to be broken out and split into more than one category. As the different sentences or paragraphs from the written comments and testimonies are sorted out into the appropriate topics/categories, the name of the person who wrote the comment should be included after each extracted portion of the comment.

The categories provided by the EPA are based on the early comments received and topics raised during the public hearings. The contractor may identify and include additional categories or further break down and refine categories as appropriate to efficiently categorize the comments.

This document shall be provided to the EPA as a Microsoft Word document. The exact format may be determined by the contractor in coordination with the EPA to identify the most efficient manner of organizing the comments under the various categories to facilitate the generation of the document and the review of the comments by the EPA.

Deliverables:

1. The Adobe Acrobat, word-searchable document containing all written comments.
2. Final Microsoft Word document containing all the written and transcript comments separated out by topic. The contractor may format the document in any manner that facilitates document generation and review as long as the topic headings are clearly identified.

IV. SCHEDULE OF DELIVERABLES:

TASK NO.	DELIVERABLE	DATE DUE TO EPA
1	Adobe acrobat pdf word-searchable document containing all written comments.	Per contract requirements
2	Microsoft Word document containing all of the written and transcript comments separated out by topic.	Within 50 business days after start of WA.
	- The EPA would like for the opportunity to preview the document after the 15 and 30 business day increments. The preview may occur via web conference and conference calls.	Web conference/conference call after 15 business days. Web conference/conference call after 30 business days.

V. MISCELLANEOUS – SOFTWARE APPLICATION AND ACCESSIBILITY (SECTION 508 REHABILITATION ACT AND AMENDMENTS)

Software Application Files and Accessibility

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, §1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See: <http://www.section508.gov/>

Preferred text format: MS Word, 8.0 or higher (Office 2003 or higher)

All delivered products intended for external EPA use will require 508 compliance.

VI. TRAVEL

No travel is required for the accomplishment of this work assignment.

VII. MEETINGS, CONFERENCES, TRAINING EVENTS, AWARD CEREMONIES AND RECEPTIONS

Conference participation is not required for the accomplishment of this work assignment. Conference calls, telephone conversations, and e-mail exchanges with UIC employees of EPA Region 8 is anticipated. However, this communication will be for coordination and clarification purposes only, none of these communications will change the scope of work of the work document.

VIII. CONTRACTOR IDENTIFICATION

Contractor personnel shall always identify themselves as contractor employees by name and organization and physically display that information through an identification badge. Contractor personnel are prohibited from acting as the Agency's official representative. The contractor shall refer any questions relating to the interpretation of EPA policy, guidance, or regulation to the CO, CL-COR and/or WACOR.

IX. PRINTING

All copying and printing shall be accomplished within the limitations of the printing clause of the contract.

X. TECHNICAL DIRECTION

The Contract level COR, Work Assignment COR (WACOR), or an authorized individual is permitted to provide technical direction. Technical direction must be within the statement of work of the contract and includes: (1) Direction to the contractor which assists the contractor in accomplishing the Statement of Work, (2) Comments on and approval of deliverables. Technical direction will be issued in writing or confirmed in writing within five (5) calendar days after verbal issuance. One copy of the technical direction memorandum will be forwarded to the Contracting Officer and the Contract Level Contracting Officer Representative.

XI. QUALITY ASSURANCE SURVEILLANCE PLAN

All task(s) identified in the performance work statement above are subject to review and approval by the EPA WACOR based on the general guidelines of the contract quality assurance surveillance plan regarding: Programmatic, cost control, timeliness/deliverables, and document development standards.

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 2-94				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-C-15-022			Contract Period 09/01/2015 To 06/30/2019			Title of Work Assignment/SF Site Name				
			Base Option Period Number 2			Region 8 Public Comment Suppor				
Contractor Cadmus Group LLC, The					Specify Section and paragraph of Contract SOW 4.3, 6.1.9					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance From 07/07/2017 To 10/28/2017					
Comments: All tasks under work assignment 2-94 are complete as of October 28, 2017. No further invoicing is authorized for costs incurred after this date.										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> (Max 2) Note: To report additional accounting and appropriations date use EPA Form 1900-69A.										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period: Cost/Fee: LOE: 09/01/2015 To 06/30/2019										
This Action: 										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated: Cost/Fee LOE:										
Cumulative Approved: Cost/Fee LOE:										
Work Assignment Manager Name Bruce Suchomel <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 303-312-6001 FAX Number:			
Project Officer Name Nancy Parrotta <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 202-564-5260 FAX Number:			
Other Agency Official Name Lisa Mitchell-Flinn <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 513-487-2852 FAX Number:			
Contracting Official Name Harold D. Hincks <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 513-487-2146 FAX Number:			